



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

February 1, 2013

Mr. R.P. Smith  
Vice President/General Manager  
Formosa Plastics Corporation, Texas  
P.O. Box 700  
Point Comfort, Texas 77978

RE: Bench-Scale Treatability Testing Report dated January 18, 2013 for the Administrative Order on Consent (AOC) Docket #VI – 001(h)-90-H

Dear Mr. Smith,

On August 21, 2013, the EPA approved the Bench-Scale Treatability Study workplan which comprised the completion of the following tests on the source areas of groundwater contaminated with ethylene dichloride (EDC): 1) a laboratory test for the viability of Insitu Chemical Oxidation (ISCO); 2) a laboratory test for the viability of enhanced bioremediation; and 3) a field test for the viability of using Multi Phase Extraction (MPE).

With EPA's approval, the workplan is now incorporated into the AOC, and compliance with the schedule in Amendment No. 2 which became effective on June 12, 2012 is an obligation under the AOC. The deliverable received on January 18, 2013 did not include the results for the Enhanced Bioremediation test, as your cover letter reported that this "test is only partially complete." The submittal of January 18, 2013 is incomplete, does not comply with the requirements of the AOC, and Formosa is therefore late.

To comply with the AOC, FPC should submit the complete the Bench-Scale Treatability Study Report. The EPA expects to receive the complete Bench-Scale Treatability Study Report on or before March 29, 2013, as the submittal continues to be late.

If you have questions or concerns, you may contact me at 214.665.8385.

Nancy Fagan

Project Coordinator

cc: Hector Gonzales, Section Manager –Waste  
TCEQ Region 14  
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